

From: Miller, Patricia G.
To: "Verhalen, Kodi"
Bcc: Marshall, Paul
Subject: CHS - additional responses to EPA's information request
Date: Wednesday, December 20, 2017 3:52:00 PM

Ms. Verhalen;

I appreciate the time you and CHS representatives took this morning to discuss a few remaining issues regard the EPA's November 17, 2017, information request. I did receive your FedEx package early this afternoon with the claimed CBI documents in a secured envelope. We have deleted all copies of your earlier emails that contained claimed CBI information.

Regarding the two specific information request items we discussed today, we are requesting that the additional information be provided to EPA by January 17, 2018, if possible. If CHS runs into any difficulties that will delay processing the information, please contact me so we can agree on a new due date. As before, if any of the information is claimed as CBI, please submit it to me in a separate envelope clearly marked as CBI.

Question no. 3:

We have agreed that based on the difficulties CHS described in producing the data EPA requested, that we would limit the time frame for the data to September and October, 2016. Our understanding is that the data can be produced as described below. If our understanding is incorrect, please let us know.

For September 2016: An Excel spreadsheet containing pH meter readings for September. This is the pH data measured in the kidney loop that is contained in the historical record recorded by the PLC that controls the pH neutralization system. These data are more "compressed" meaning that the pH value is only saved to history when it varies from the previous reading by a value of anywhere from 10% to 30% (not on a logarithmic scale). Because the way the historic data was saved, our understanding is that the time intervals between pH records recorded may be variable. Because the procedures for saved historical data in September is more compressed than October, we understand that CHS may include additional explanatory comments.

For October 2016: An Excel spreadsheet containing the second-by-second measurements of pH for each day of the month. These are the pH readings from the pH probe in the kidney loop. We understood CHS to indicate that each day's values would be on a separate worksheet in the Excel workbook.

For both October and September 2016, the PLC for the neutralization system also recorded the flow measured by the flow meter, which is the discharge to the city. This should be provided on the same time interval as the pH readings.

Question no. 5:

For January 1, 2016 to October 31, 2016, please provide the total plant consumption of the two specific chemicals CHS identified in its response to the information request that it used in the pH neutralization system. (NOTE: these chemicals were claimed as CBI, and are therefore are not

identified here.) We understood from our phone conversation that CHS is checking on data availability because the purchase records that include this data are presently with the corporate office for tax filing preparation.

Thank you in advance for your cooperation. I will generally be out of the office until January 3rd, but I will remain available by phone if you have any questions.

Wishing you and your client a happy and safe holiday.
Pat

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